

# EXHIBIT 30

1 Hon. Tiffany M. Cartwright  
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8 UNITED STATES DISTRICT COURT  
9 FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

10 JOANN LEDOUX, a single woman.

11 Plaintiffs,

12 v.

13 OUTLIERS, INC. (d/b/a THESIS, THESIS  
14 NOOTRPICS, FIND MY FORMULA, and  
FORMULA), a Delaware Corporation;  
15 DANIEL FREED, individually; MATT  
RUBIN, individually; BRAND  
16 NUTRACEUTICALS, INC. (d/b/a BRAND  
NUTRA), a New York Corporation; BRAND  
17 PACKAGING GROUP, INC. (d/b/a BRAND  
NUTRACEUTICALS), a New York  
18 Corporation; and John and Jane Does 1-5.  
Defendants.

19 Defendants.

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21 No. 3:24-cv-05808-TMC

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26 **NOTICE TO WITHDRAW  
MOTION**

27 In late 2024, Defendant Outliers, Inc. (“Thesis”), Daniel Freed, and Matt Rubin  
28 (collectively, the “Thesis Defendants”) moved to compel arbitration. *See* Motion to Compel  
29 Arbitration, Stay Case, or in the Alternative Dismiss Case (Dkt. No. 14). On February 18,  
30 2025, the Court denied the motion without prejudice to refiling. *See* Order Denying Motion  
31 to Compel Arbitration and Granting in Part and Denying in Part Motion to Dismiss (Dkt.  
32 No. 39). In March, the Thesis Defendants retained new counsel and filed a second motion to

1      compel arbitration. *See* Thesis Defendants' Second Motion to Compel Arbitration (Dkt. No.  
 2      58).

3      Last month, the Thesis Defendants elected to withdraw their Second Motion to  
 4      Compel Arbitration and proceed with litigation on the merits. *See* Thesis Defendants' Notice  
 5      to Withdraw Pending Motion (Dkt. No. 86). On April 30, 2025, the Thesis Defendants, the  
 6      Brand Defendants, and LeDoux jointly moved to lift the stay of merits discovery. *See*  
 7      Stipulated Motion and [Proposed] Order Regarding Lifting Stay on Discovery (Dkt. No. 87).  
 8      This Court granted that Stipulated Motion the same day. *See* Stipulated Motion and Order  
 9      Regarding Lifting Stay on Discovery (Dkt. No. 88).

10     At LeDoux's request, the Thesis Defendants withdraw the First Motion to Compel  
 11     Arbitration (Dkt. No. 14), the Thesis Defendants' Reply in Support of that Motion (Dkt. No.  
 12     29), and all supporting materials, including the Affidavit of Daniel Freed and the exhibits  
 13     attached thereto (Dkt. No. 15) and the Affidavit of Ben Fisher (Dkt. No. 29-1). The Thesis  
 14     Defendants also stipulate that they shall not seek to arbitrate claims or disputes raised in  
 15     LeDoux's First Amended Complaint (Dkt. No. 45) or appeal any denial of arbitration  
 16     regarding the same.

17     DATED: May 7, 2025.

18     **MURPHY BALL STRATTON LLP**

19     By: /s/ Richard Houghton  
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